

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NEW YORK

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BLACK LOVE RESISTS IN THE RUST, et al.,

*Plaintiffs,*

- vs -

Case No. 1:18-cv-00719-CCR  
Judge Reiss

CITY OF BUFFALO, N.Y., et al.,

*Defendants.*

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**MOTION TO WITHDRAW AS PLAINTIFFS' COUNSEL**

Pursuant to Rule 83.2(c)(4) of the Local Rules of the United States District Court for the Western District of New York, Plaintiffs Black Love Resists in the Rust (“Black Love Resists” or “BLRR”) and individual plaintiffs and class representatives, Dorethea Franklin, Taniqua Simmons, De’Jon Hall, and Jane Doe, by and through counsel, respectfully move the Court to allow Keisha A. Williams to withdraw as counsel of record in the above-captioned proceeding. As of November 2, 2023, Ms. Williams will no longer be employed by the Western New York Law Center. No party will be prejudiced or otherwise adversely affected by Ms. Williams’ withdrawal as the plaintiffs will continue to be represented by the other plaintiffs’ attorneys of records in this case from the Center for Constitutional Rights, the National Center for Law and Economic Justice, the Western New York Law Center, and the law firm of Covington & Burling, LLP.

Dated Buffalo, New York  
October 31, 2023

Respectfully submitted,

/s/ Keisha Williams

Keisha A. Williams

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 31, 2023, a true and correct copy of the foregoing document was served on the following via electronic mail:

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/s/ Keisha Williams  
Keisha A. Willaims